IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

1

WILLIAM NEGRON	
Plaintiff,	Case No. 18-CV-2701
v.	Honorable Jeffrey I. Cummings
REYNALDO GUEVARA, ET. AL.	
Defendants.	

UNOPPOSED MOTION TO EXTEND THE TIME TO REINSTATE

NOW COMES Plaintiff, William Negron, by and through his undersigned attorneys, and moves to extend the time to reinstate this cause. In support thereof, Plaintiff states as follows:

- 1. On October 23, 2025, pursuant to a stipulation between the parties, this Court dismissed this suit without prejudice, granting leave to reinstate on or before January 6, 2026. Dkt. 279.
- 2. The parties expected that Chicago's city council would approve the settlement before this date, but the council has not yet voted on the settlement.
- 3. Accordingly, Plaintiff respectfully requests that this court extend the time for the parties to reinstate this cause before it is dismissed with prejudice. Plaintiff requests that the Court extend the time to reinstate this action until April 6, 2026.
- 4. An extension will give the City time to have its council vote whether to approve or reject the settlement, while avoiding any prejudice to Plaintiff from prematurely dismissing this action with prejudice.
 - 5. The Defendants do not oppose this motion.

WHEREFORE, Plaintiff respectfully requests that the time to move to reinstate this action be extended to April 6, 2026, or any other relief this Court deems just.

Respectfully Submitted,

/s/ Russell Ainsworth
One of Plaintiff's Attorneys

Arthur Loevy Jon Loevy Russell Ainsworth Lindsay Hagy Loevy & Loevy 311 N. Aberdeen, 3rd Floor Chicago, Illinois 60607 (312) 243-5900